



EDGAR & ASSOCIATES, INC.

EVAN W.R. EDGAR, P.E. SEAN R. EDGAR NEIL S.R. EDGAR

April 24, 2009

Mr. Bill Brattain
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite #200
Rancho Cordova, CA 95670-6114

Re: Quackenbush Mt. Resource Recovery and Compost Facility
 Comments on Tentative Revised Waste Discharge Requirements for Composting
 Operations

Dear Mr. Brattain,

The purpose of this letter is to provide comments related to the tentative revised Waste Discharge Requirements (WDRs) for the South Lake Refuse Resource Recovery and Compost Facility on Quackenbush Mountain. We appreciate your timeliness in preparing the WDRs and we look forward to the June 2009 RWQCB meeting. The operator supports the tentative WDRs with a clarifying amendment to explicitly add a third aerated static pile technology.

We wish to amend information submitted with the Report of Waste Discharge (ROWD) relating to the Enclosed Vessel Aerated Static Pile system (EVASP) to explicitly allow the use of a containerized aerated pile system covered by compost material. We believe the tentative WDRs would allow this to occur in the generic sense, however we would like to add "containerized aerated static pile system covered with compost" as a third type of aerated static pile to allow commercial food waste to be composted in modified debris boxes covered with compost as the bio-filter. The operator has been successful in a pilot project in Napa County at the Upper Valley Recycling facility where 40-cubic yard debris boxes were retro-fitted to containerize commercial food while composting, in an enclosed vessel.

The utilization of either covered aerated static pile or enclosed vessel aerated static pile (sometimes called in-vessel) technologies that provide considerable protection to water resources at the site and are described fully within the ROWD – remains accurate, but would need to be amended to include an additional equipment option under the EVASP systems, called "containerized aerated static pile system covered with compost"

During the interim time since submittal of the ROWD, the operator has begun a successful pilot program to compost food waste within a different type of EVASP container: a steel container, approximately 8 feet by 22 feet and 6 feet in height, similar in size and appearance to a typical roll-off debris box. This covered, watertight vessel is fitted with ports to which external aeration equipment is attached that allow for the forced aeration which promotes aerobic decomposition within the vessel. This EVASP equipment will be utilized in addition to the collapsible bag system described in the ROWD and will afford improved environmental controls due to a significantly lower potential for leakage.

Please contact our office at (916) 739-1200 if you need any additional information regarding this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Evan W.R. Edgar". The signature is stylized with a large "E" and "W".

Evan W.R. Edgar
Principal Civil Engineer

cc: Bob Pestoni, South Lake Refuse & Recycling